# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CONVOLVE, INC.	§	
	<b>§</b>	
Plaintiff,	§	
	<b>§</b>	
<b>v.</b>	§	Civil Action No. 2:08-cv-244
	§	
DELL INC., et al.	§	JURY TRIAL DEMANDED
	<b>§</b>	
Defendants.	§	

# **NOTICE OF DISCLOSURE**

Plaintiff Convolve, Inc. certifies that, pursuant to Fed. R. Civ. P. 26(a)(2), L.R. CV-26(b), this Court's Discovery Order at 1(h) (Docket No. 60), this Court's Docket Control Order (Docket No. 253), it served its "Expert Reports of Gregory K. Leonard, PH.D. and Dr. Kent D Van Liere" on opposing counsel via electronic mail only on April 22, 2011.

DATED: April 22, 2011 Respectfully submitted,

### ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

### /s/ Elizabeth V. Thomas\_

A. James Anderson (admitted pro hac vice)

Georgia Bar No. 016300

Anna C. Halsey (admitted pro hac vice)

Georgia Bar No. 208034

Elizabeth V. Thomas (admitted *pro hac vice*)

Georgia Bar No. 624263

Ailis L. Burpee (admitted *pro hac vice*)

Georgia Bar No. 623492

2600 One Atlanta Plaza

950 East Paces Ferry Road, N.E.

Atlanta, Georgia 30326-1386

Telephone: (404) 760-4300

Facsimile: (404) 233-1267

Email: ajanderson@rkmc.com

Email: achalsey@rkmc.com

Email: evthomas@rkmc.com

Email: alburpee@rkmc.com

Marla R. Buter (admitted *pro hac vice*)

Georgia Bar No. 099917

Bryan J. Vogel (admitted *pro hac vice*)

New York Bar No. 3933736

601 Lexington Avenue

34th Floor

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

Email: mrbutler@rkmc.com

Email: bjvogel@rkmc.com

Eric M. Albritton

Texas State Bar No. 00790215

Stephen E. Edwards

Texas Bar No. 00784008

ALBRITTON LAW FIRM

P.O. Box 2649

Longview, Texas 75606

Telephone: (903) 757-8449

Facsimile: (903) 758-7397

Email: ema@emafirm.com

Email2 see@emafirm.com

T. John Ward, Jr.
Texas State Bar No. 00794818
WARD & SMITH LAW FIRM
P.O. Box 1231
Longview, Texas 75606
Telephone: (903) 757-6400

Facsimile: (903) 757-2323 Email: jw@jwfirm.com

ATTORNEYS FOR PLAINTIFF CONVOLVE, INC.

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CONVOLVE, INC.	§	
	<b>§</b>	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 2:08-cv-244
	§	
DELL INC., et al.	<b>§</b>	JURY TRIAL DEMANDED
	§	
Defendants.	§	

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing "Notice of Disclosure for Expert Reports of Gregory K. Leonard, PH.D. and Dr. Kent D Van Liere" has been served upon the following counsel of record via electronic mail only, this <u>22nd</u> day of <u>April</u>, 2011:

Scott F. Partridge	Douglas E. Lumish
Roger Fulghum	Jeffrey Homrig
Tammy Pennington	Joseph H. Lee
Brad Bowling	Joseph B. Shear
Amanda Woodall	Jeremy Jason Lang
BAKER BOTTS L.L.P.	KASOWITZ, BENSON, TORRES &
One Shell Plaza	FRIEDMAN LLP
910 Louisiana Street	101 California Street, Suite 2300
Houston, TX 77002-4995	San Francisco, California 94111

Michael C. Smith SIEBMAN, REYNOLDS, BURG, PHILLIPS & SMITH., L.L.P. 713 South Washington	Patricia Young KASOWITZ, BENSON, TORRES & FRIEDMAN LLP 1633 Broadway
Marshall, TX 75670	New York, NY 10019-6799
	T . II T . II

Deron R. Dacus RAMEY & FLOCK, P.C.	Eric H. Findlay	
	FINDLAY CRAFT	
	6760 Old Jacksonville Hwy, Suite 101	
100 East Ferguson	Tyler, TX 75703	
Suite 500	•	
Tyler, TX 75702	Attorneys for Defendants	

Attorneys for Defendants Hitachi Global Storage Technologies, Inc. and Hitachi, Ltd. Kimball R. Anderson WINSTON & STRAWN 35 W. Wacker Drive Chicago, IL 60601-9703

### Attorneys for Defendant Dell, Inc.

Bruce Wessel
Thomas Werner
Richard Birnholz
Garland A. Kelley
IRELL & MANELLA L.L.P.
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067

Rey Barcelo BARCELO & HARRISON, LLP 2901 West Coast Hwy, Suite 200 Newport Beach, CA 92663

Harold Kip Glasscock, Jr.
KIP GLASSCOCK ATTORNEY AT LAW
550 Fannin, Suite 1350
Beaumont, TX 77701

Melissa Richards Smith GILLAM & SMITH, L.L.P. 303 South Washington Avenue Marshall, Texas 75670

Attorneys for Defendant Western Digital Corporation

DATED: April 22, 2011

/s/ Elizabeth V. Thomas

Elizabeth V. Thomas

30424878.1

### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 22nd day of April 2011.

/s/ Elizabeth V. Thomas
Elizabeth V. Thomas